

# Exhibit 1

**UNITED STATES INTERNATIONAL TRADE COMMISSION  
WASHINGTON, D.C.**

**Before The Honorable Doris Johnson Hines  
Administrative Law Judge**

**In the Matter of**

**CERTAIN CAMERAS, CAMERA  
SYSTEMS, AND ACCESSORIES  
USED THEREWITH**

**Investigation No. 337-TA-1400**

**JOINT SUBMISSION REGARDING ORDER NO. 19**

Pursuant to Order No. 19, Complainant GoPro, Inc. (“GoPro”) and Respondents Arashi Vision Inc. d/b/a Insta360 and Arashi Vision (U.S.) LLC d/b/a Insta360 (collectively “Respondents” or “Insta360”) met and conferred on December 26, 2024 and hereby submit this joint proposal regarding Dr. Dan Schonfeld’s conflict (as articulated in Exhibit A to Order 19).

The parties propose scheduling both the technology tutorial and prehearing conference on Friday, January 10. The parties then propose rearranging Complainant’s affirmative case so that Dr. Schonfeld’s testimony concerning infringement commences and concludes on Monday, January 13, 2025. GoPro recognizes that this sequencing may require Dr. Schonfeld to rely on certain documents and evidence that will be admitted later, through subsequent fact witnesses.<sup>1</sup> This change will allow Dr. Schonfeld to travel to Texas in time for his expected testimony in the Samsung matter on January 15 or January 16.

Dr. Schonfeld is also expected to testify in Complainant’s rebuttal case on January 17. Ideally, Dr. Schonfeld would complete his testimony in Texas on January 15, allowing him to potentially appear live in Complainant’s rebuttal case. If, however, Dr. Schonfeld’s testimony in

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<sup>1</sup> Insta360 reserves the right to object to such documents and evidence whenever GoPro seeks to admit them and to move to strike Dr. Schonfeld’s related testimony if necessary.

Texas extends to January 16, Complainant would arrange for a remote appearance on January 17. In the unlikely event that Dr. Schonfeld becomes unavailable for even a remote appearance on January 17, GoPro would request that his testimony and any rebuttal to his testimony be scheduled for a remote session the following week (January 20 – January 24).

Based on the foregoing proposal, the parties propose the following witness order, with a good faith estimate of time for examination of each witness:

Witness/Event	GoPro	Insta360	Date
Prehearing Conference	30	30	10-Jan
Opening	45	30	13-Jan
<b>GoPro Case</b>			
N. Woodman	45	20	13-Jan
N. Rahmouni	30	10	13-Jan
D. Stimm <sup>2</sup>	30	10	13-Jan
D. Schonfeld	90	40	13-Jan
P. Lema	30	15	14-Jan
H. Nguyen	30	20	14-Jan
J. Delman	60	40	14-Jan
J. Villasenor	90	40	14-Jan
C. Mulhern	20	20	15-Jan
<b>Insta360 Case</b>			
B. Nie	15	30	15-Jan
B. Sang	25	60	15-Jan
W. Su	20	60	15-Jan
G. Cao	10	20	15-Jan
T. Darrell	60	90	16-Jan
R. Goodin	60	120	16-Jan
P. Bressler	40	90	17-Jan
T. Vander Veen	15	30	17-Jan
<b>GoPro Rebuttal</b>			
J. Delman	30	10	17-Jan
D. Schonfeld	30	10	17-Jan

<sup>2</sup> GoPro informed Insta360 just before the filing of this proposal that it intends to call as a witness Mr. Darryl Stimm, who was not identified on GoPro's list of witnesses in its pre-hearing statement, instead of Mr. Jonathan Thorn. Insta360 noted that GoPro must move for leave to file an amended pre-hearing statement to add Mr. Stimm, which it has not yet done. Insta360 reserves all rights with respect to GoPro's motion and this late disclosure.

J. Villasenor	30	10	17-Jan
<b>Insta360 Rebuttal</b>			
T. Darrell	15	30	17-Jan
R. Goodin	15	30	17-Jan
P. Bressler	15	30	17-Jan

Dated: December 26, 2024

Respectfully submitted,

*/s/ Patrick T. Schmidt*

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*/s/ Mark L. Whitaker*

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**CERTIFICATE OF SERVICE**

I, Jeffrey Matthews, hereby certify that on December 26, 2024, copies of the foregoing documents were served upon the following parties as indicated:

<p>The Honorable Lisa R. Barton Secretary to the Commission U.S. International Trade Commission 500 E Street, SW Washington, D.C. 20436</p>	<p><input type="checkbox"/> Via First Class Mail <input type="checkbox"/> Via Hand Delivery (2 copies) <input type="checkbox"/> Via Electronic Mail <input checked="" type="checkbox"/> Via EDIS</p>
<p>The Honorable Cameron E. Elliot Administrative Law Judge U.S. International Trade Commission 500 E Street, SW, Room 317 Washington, D.C. 20436 Email: michael.turner@usitc.gov</p>	<p><input type="checkbox"/> Via First Class Mail <input type="checkbox"/> Via Hand Delivery (2 copies) <input checked="" type="checkbox"/> Via Electronic Mail <input type="checkbox"/> Via EDIS</p>
<p>Mark L. Whitaker Mary Prendergast Brian Busey Jenna H. Spoont Caleb Woods <b>Morrison &amp; Foerster LLP</b> 2100 L Street, NW Suite 900 Washington, DC 20037 (202) 887-1500 mwhitaker@mofo.com MoFo_Insta360-ITC_Service@mofo.com</p> <p>Lily Li Evelyn Li-Jin Chang <b>Morrison &amp; Foerster LLP</b> 755 Page Mill Road Palo Alto, California 94304-1018 (650) 813-5600 yli@mofo.com MoFo_Insta360-ITC_Service@mofo.com</p> <p>Alex S. Yap <b>Morrison &amp; Foerster LLP</b> 707 Wilshire Boulevard, Suite 6000 Los Angeles, CA 90017-3543 (213) 892-5200 AYap@mofo.com</p>	<p><input type="checkbox"/> Via First Class Mail <input type="checkbox"/> Via Hand Delivery (2 copies) <input checked="" type="checkbox"/> Via Electronic Mail <input type="checkbox"/> Via EDIS</p>

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